

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Britt Industries, Inc.  
Attn: Bill Schroll  
3010 Malmo Road  
Arlington Heights, Illinois 60005

<u>Application No.:</u> 98060061	<u>I.D. No.:</u> 031403AAC
<u>Applicant's Designation:</u> COATING	<u>Date Received:</u> June 18, 2001
<u>Subject:</u> Coating Operations	
<u>Date Issued:</u> July 25, 2001	<u>Expiration Date:</u> October 8, 2003
<u>Location:</u> 3010 Malmo Road, Arlington Heights	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of fuel combustion equipment (air make-up unit, three-stage washer burner, dry-off oven, curing oven, batch oven, burn-off oven with afterburner), spray booths (1-5) with filters, three-stage washer, and clean up operations pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) to less than 25 tons per year, individual hazardous air pollutants (HAP) to less than 10 tons per year, and a combination of such HAPs to less than 25 tons per year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. Emissions and operation of the spray booths (1-5) and clean up operations shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Coatings	2.5	19.6	2.5	19.6
Clean Up Solvents	0.6	4.9	0.6	4.9

These limits are based on the maximum material usage and the maximum VOM content of the coating and solvents. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- b. Pursuant to 35 Ill. Adm. Code 218.205(b)(1), the daily weighted average VOM content of the "baked" coatings applied in the five spray booths shall not exceed 3.3 lb VOM/gal of coating (minus water and any compounds which are exempted from the definition of VOM) as applied at each applicator.
- c. Pursuant to 35 Ill. Adm. Code 218.205(b)(1), the daily weighted average VOM content of the "air dried" coatings applied in the five spray booths shall not exceed 3.5 lb VOM/gal of coating (minus water and any compounds which are exempted from the definition of VOM) as applied at each applicator.
- 3a. Emissions and operation of the fuel combustion equipment shall not exceed the following limits:

Fuel Usage		Pollutant	Emission	Emissions	
(mmscf/Mo)	(mmscf/Yr)		Factor (Lb/mmscf)	(Ton/Mo)	(Ton/Yr)
2.66	21.29	NO <sub>x</sub>	100	0.2	1.1
		CO	84	0.2	0.9
		PM	7.6	0.1	0.1
		VOM	5.5	0.1	0.1
		SO <sub>2</sub>	0.6	0.1	0.1

These limits are based on maximum fuel usage and standard emission factors. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel fired in the fuel combustion equipment. Use of any other fuel requires a permit revision.
- 4. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 5. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

- 6a. The Permittee shall maintain monthly records of the following items:
- i. The name and identification number of each coating as applied on each coating line (daily);
  - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
  - iii. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 Ill. Adm. Code 218.104;
  - iv. The amount of each clean up solvent used (gal or ton/mo and gal or ton/yr);
  - v. VOM content of each clean up solvent used (wt. % or lb/gal);
  - vi. Natural gas fuel usage (mmscf/month and mmscf/year); and
  - vii. Detailed calculations of VOM and HAP emissions (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
7. This permit is issued based on negligible emissions of particulate matter from spray booths (1-5) controlled by filters. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

9. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
- a. The name and identification number of each coating as applied on each coating line (daily);
  - b. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
  - c. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 Ill. Adm. Code 218.104;
  - d. The amount of each clean up solvent used (gal or ton/mo and gal or ton/yr);
  - e. VOM content of each clean up solvent used (wt. % or lb/gal);
  - f. Natural gas fuel usage (mmscf/month and mmscf/year); and
  - g. VOM and HAP emissions (tons/month and tons/year).

It should be noted that this permit has been revised to incorporate Construction Permit 01060047 with no increase in emissions and to revise the VOM content limit and emission limits in Condition 2.

If you have any questions on this, please call Tara T. Nguyen-Ede at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
Lotus Notes

### Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is using 24.5 tons per year of VOM in the spray booths. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year of individual HAPs and 25 tons per year of a combination of such HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, low VOM coatings are used, and control measures are more effective than required in this permit.

1. Emissions and operation of the spray booths (1-5) and clean up operations shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Coatings	2.5	19.6	2.5	19.6
Clean Up Solvents	0.6	4.9	0.6	4.9

These limits are based on the maximum material usage and the maximum VOM content of the coating and solvents. Compliance with the annual limits shall be determined from a running total of 12 months of data.

2. Emissions from the fuel combustion equipment:

<u>Fuel Usage</u>		<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>		<u>Factor</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
2.66	21.29	NO <sub>x</sub>	100	0.2	1.1
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		VOM	5.5	0.1	0.1
		SO <sub>2</sub>	0.6	0.1	0.1

These limits are based on maximum fuel usage and standard emission factors. Compliance with the annual limits shall be determined from a running total of 12 months of data.

3. This permit is issued based on negligible emissions of particulate matter from spray booths (1-5) controlled by filters. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
4. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

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